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By ECF

September 15, 2023

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007


Re: United States v. Michael Paschal, No. 21-cr-00331 (VSB)

Dear Judge Broderick:

We represent Defendant Michael Paschal in the above-captioned action, and write on behalf of the parties to respectfully request a 30-day extension of the date for sentencing. The sentencing hearing is currently set for October 6, 2023. Mr. Paschal's sentencing filing is currently due two weeks prior to the sentencing hearing, on September 22, 2023.

We respectfully request that the sentencing be adjourned until November 8, 2023, or the first day thereafter that is convenient for the Court. Sentencing submissions will be filed on the timeframe set by the Court's rules. The government has advised that it does not oppose this request. The Probation Office has yet to disclose its Presentence Report, and expects that it will be disclosed this week or next. This leaves inadequate time for defense counsel to review the Presentence Report, provide any necessary comments, and prepare Mr. Paschal's sentencing filing. Additionally, Mr. Paschal's post-trial motion for acquittal on Counts Three and Four is still pending before the Court, and the resolution of such will impact sentencing.

We are grateful for the Court's attention to this matter.

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 09/18/2023

The sentencing scheduled for October 6,
2023 is hereby adjourned to December 8,
2023 at 12:00 PM.

Respectfully Submitted,

/s/ Arlo Devlin-Brown

Arlo Devlin-Brown
Catherine Carulas
Counsel for Michael Paschal

cc: Kevin Mead, Jackie Delligatti, Jane Kim, Assistant United States Attorneys